



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



424138

COPY

REPLY TO THE ATTENTION OF:

July 9, 2009

Mr. Michael J. Erickson  
Associate Vice President/Principal Engineer  
ARCADIS  
10559 Citation Drive, Suite 100  
Brighton, MI 48116

SR-6J

RE: Request for Data Usability Determination

Dear Mr. Erickson:

The United States Environmental Protection Agency (EPA) has completed its review of the request for data usability determination for existing Kalamazoo River data for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. The purpose of the request is to determine the usability of existing data for the Supplemental Remedial Investigation/Feasibility Study (SRI/FS).

The existing site data was separated into the following categories for consideration of the usability request:

1. Data collected according to approved Work Plans, Field Sampling Plans, and Quality Assurance Project Plans and subject to field oversight by the Agencies.
2. Data collected at the direction of either the Michigan Department of Environmental Quality or EPA following project Standard Operating Procedures (SOPs) for sampling and validation and the effort was subject to field oversight by the Agencies.
3. Site-specific data collected by various governmental agencies.
4. Data collected for the Supplemental Investigation utilizing SOPs for field sampling, analysis and data validation; however, the work was not performed under an Agency-approved work plan and no field oversight was performed.

5. Historical data collected prior to the RI/FS process. This data may not have been collected utilizing approved work plans, sample plans or quality assurance project plans and have not been validated with the rigor of more recent SRI/FS data.

EPA further evaluated if the data may be included in the project database to supplement future studies. This determination is not an evaluation of how representative or complete the data sets are for meeting various project objectives, as use of the data is limited to the applicable data quality objectives of the study.

EPA received hard copy laboratory analytical reports with the data validation summaries from ARCADIS/BBL and reviewed 10 data packages, representing approximately 1% of the results. The data packages selected for review were from the supplemental investigation sampling events which were performed without Agency approval or oversight. The data packages included sediment, groundwater, surface water, and fish tissue results.

As a result of the review and consideration of potential uses for the data, EPA has the following recommendations on the usability of the above-mentioned categories of data:

- **Categories 1 and 2** - Data were collected following an administrative approval and oversight process. These data are acceptable for inclusion in the existing project database to supplement future studies and evaluations.
- **Category 3** - Data collected by various state and federal agencies may be included in the database and used as appropriate. Data that was not collected and validated utilizing site-specific SOPs should be flagged. Physical data may be used if field notes and raw data sheets are included in published reports verifying the information.
- **Category 4** - EPA reviewed ten data packages provided by ARCADIS/BBL. These data packages were selected to represent over 949 data packages analyzed since 1993. Based on the data packages reviewed, the data analysis and validation appear to be consistent with the approved QAPP and SOPs in place at the time of analysis, but without following an administrative review and approval process or field oversight. These data may be considered as supplemental information and included in the project database with a flag identifying it. When used in

evaluations or reports, a brief description of the data limitations should be included in the text. Tables and figures should include flags on the data and notations indicating that the data was collected without Agency review or approval of work plans or field oversight.

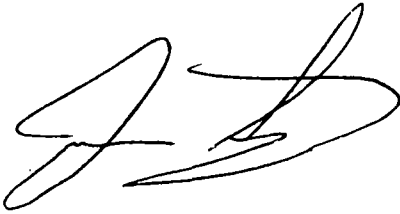
- **Category 5** - Historical data collected prior to the RI/FS process was not collected under the same procedures and protocols as the RI/FS data. The data should only be used for qualitative evaluations providing a historical perspective. When used in evaluations or reports, a brief description of the data limitations should be included in the text. Tables and figures must include notations identifying the data and indicating that it was not collected using approved plans.

In summary, EPA's review of the subset of data packages did not identify issues with the data. The data can be used when flagged appropriately and in the proper context. In addition to flagging the results, the following conditions apply:

- The data can be used as a part of the data set when appropriately flagged and noted, but decisions should not be made solely on or heavily weighted on the Supplemental Investigation data (Category 4), historic data collected prior to the RI/FS process (Category 5), or other flagged data.
- The data usability could be subject to further evaluation by EPA as deemed appropriate.
- This determination is not an evaluation of how representative or complete the data sets are for meeting various project objectives.
- The determination of usability does not extend to approval of the conclusions drawn from use of the data.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'JAS', written in a cursive style.

James A. Saric  
Remedial Project Manager  
SFD Remedial Response Branch #1

cc: Paul Bucholtz, MDEQ  
Gary Griffith, Georgia-Pacific  
Richard Gay, Weyerhaeuser

bcc:

Jeff Keiser, CH2MHILL  
Leslie Kirby-Miles, ORC